

TROY LAW, PLLC

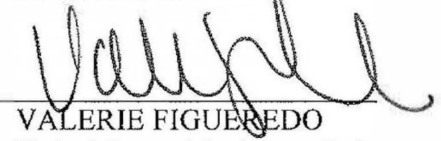
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Via ECF

Hon. Valerie Figueredo, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

SO ORDERED



VALERIE FIGUEREDO

United States Magistrate Judge

Dated: 11-30-2022

Plaintiff has until December 21, 2022 to submit the Proposed Findings as described in the Court's previous order at ECF No. 156 (16-cv-4790) and ECF No. 115 (17-cv-2536). Further extensions to this deadline will not be granted absent extraordinary circumstances.

Re: Plaintiff's Letter Requesting Extension of Time to file Proposed Findings of Fact and Conclusion of Law until December 21, 2022, from November 30, 2022

Chen v. Shanghai Café Deluxe, Inc., No. 16-cv-04790 (DF), (S.D.N.Y.) ("*Chen FLSA*")

Chen v. Shanghai Café Deluxe, Inc., No. 17-cv-02536 (DF), (S.D.N.Y.) ("*Chen ADEA*")

Your Honor,

This office represents the Plaintiff in the above referenced matter. We write to respectfully request extension of time to submit Plaintiffs proposed findings of fact and conclusion of law against Defendants until December 21, 2022, from November 30, 2022. This is the First request made by the Plaintiff's Counsel. Granting this request would not prejudice the Defendants as the Defendants are currently in default.

Your Honor, on October 21, 2022, Ordered Plaintiff's to file their Proposed findings of fact and conclusion of law specifically to tie the proposed damages figure(s) to the legal claims on which liability will be established, and further ordered Plaintiff's Counsel to demonstrate how Plaintiff has arrived at the proposed damages figure(s) against the defaulting Defendants in both the above referenced matters. *See* Dkt. No. 156 (16-cv-04790); Dkt. No. 115 (17-cv-02536). Unfortunately, yesterday Plaintiff's Counsel was feeling severely ill and took an antigen test and has been tested positive with Covid-19.

In light of this, I respectfully request this Court to extend the Plaintiff's time to submit their Proposed findings of fact and conclusion of law until December 21, 2022, from November 30, 2022 and also extend Defendants time to submit any opposition if any until January 20, 2023.

We thank the Court for its continued attention and consideration in this matter.

Respectfully Submitted,

/s/ Aaron Schweitzer

Aaron Schweitzer, Esq.

Attorney for Plaintiff